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May 15, 2012

VIA EMAIL

The Honorable Richard G. Andrews
United States District Court
District of Delaware
844 N. King Street
Wilmington, DE 19801

REDACTED
PUBLIC VERSION

Re: **Rovi Corp. et al. v. Hulu LLC, C.A. No. 11-665-RGA (D. Del.)**

Dear Judge Andrews:

I write with regard to the reply brief filed by Hulu, LLC this morning in support of its Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a) and in particular Hulu's request that the Court not transfer this case for at least three more months (which was not part of the relief originally sought by Hulu in its motion, D.I. 34). Rovi opposes this request because it would amount to a *de facto* three-month stay almost a year into this litigation.

This case has been pending for almost nine full months. Hulu did not file its motion to transfer the case until two days before the Rule 16 Conference. At no time has Hulu explained why it did not raise its venue concerns at the outset, before bringing two rounds of pleadings challenges, and sooner than two weeks before the Rule 16 Conference. While Rovi believes that it has more than a good-faith basis to maintain the litigation in this District, in the interest of ending the procedural delays and getting to the merits, Rovi has decided to agree to Hulu's preferred forum, and accordingly filed yesterday a Statement of Non-Opposition and Proposed Order (D.I. 45). Both parties are now in agreement that this case should be heard in the Central District of California.

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Respectfully,

/s/ Frederick L. Cottrell, III

Frederick L. Cottrell, III (#2555)

FLC:jjr

cc: All counsel of record (via CM/ECF and electronic mail)